

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

**ZAO ODESSKY KONJATSCHNYI
ZAWOD, a Ukrainian corporation,**

Plaintiff,

v.

**SIA "BALTMARK INVEST," a Latvian
corporation,**

**GLOBAL CLOSED JOINT STOCK
COMPANY, a Russian closed joint-stock
company, and**

**ZAO "GRUPPA PREDPRIYATIY OST," a
Russian closed joint-stock company,**

Defendants.

Civil Action No. 1:12-cv-515

**Hon. James C. Cacheris
Hon. Ivan D. Davis**

PLAINTIFF'S AMENDED EXHIBIT LIST

Pursuant to this Court's Rule 16(B) Scheduling Order dated May 28, 2013 (ECF # 77), its prior Order dated February 1, 2013 (ECF # 46) and Fed. R. Civ. P. 26(a)(3), Plaintiff amends its exhibit list, in light of the deposition of Elena Sorokina on September 9, 2013 and documents produced by Defendant SIA "Baltmark Invest" on September 18, 2013, and the Court granting Plaintiff's motion for leave to amend its complaint on September 27, 2013:

	<i>Description</i>	<i>Date</i>	<i>BATES Nos./ Identification</i>
PX-1	Defendant SIA "Baltmark Invest"'s Responses to Plaintiff ZAO Odessky Konjatschnyi Zawod's First Set of Interrogatories (Aug. 9, 2013)	Aug. 9, 2013	
PX-2	Trademark Application Serial No. 78/240612	April 22, 2003	
PX-3	Trademark Application Serial No.	May 23, 2003	

	76/51958		
PX-4	Petition for Cancellation submitted by ZAO Odessky Konjatschniji Zawod in re Reg. No. 2885912	February 2, 2007	
PX-5	SIA "Baltmark Invest" Articles of Association	September 23, 2010	BALTMARK 0738
PX-6	Declaration of Use and Excusable Nonuse of Mark in Commerce Under Section 8, submitted in Reg. No. 2885912	March 21, 2011	
PX-7	United States Patent and Trademark Office (USPTO) Office Action (Official Letter) About Registrant's Trademark Registration, Reg. No. 285912, rejecting March 21, 2011 Declaration	April 13, 2011	
PX-8	Response to USPTO Office Action by ZAO "Gruppa Predpriyatji" OST In Reg. No. 2885912	October 13, 2011	
PX-9	United States Patent and Trademark Office, Trademark Trial and Appeal Board decision in ZAO Gruppa Predpriyatij OST v. ZAO Odessky Konjatschnyi Zawod, Cancellation No. 92047126 against Reg. No. 2885912	February 8, 2012	Complaint Exh. A
PX-10	Trademark Assignment in Reg. No. 2885912 (purporting to assign trademark to Global CJSC)	March 15, 2012	BALTMARK 0698-699
PX-11	Trademark Assignment in Reg. No. 2885912 (purporting to assign trademark to Baltmark)	March 15, 2012	
PX-12	Trademark License Agreement between Baltmark and OST Ltd	July 17, 2013	BALTMARK 0747-50
PX-13	Agency Agreement between Global CJSC and Baltmark	May 23, 2011	BALTMARK 0805-0808
PX-14	Minutes of Extraordinary Shareholders Meeting of ZAO Global Closed Joint Stock Company	May 11, 2011	BALTMARK 0730-0731
PX-15	Power of Attorney from Ziatseva to Zhupansky	March 11, 2011	BALTMARK 0732
PX-16	Decision of the Arbitration Court of Moscow in <i>Baltmark v. Global CJSC</i>	June 17, 2013	
PX-17	Decision of the Arbitration Court of the Khabarovsk Region in <i>Batryeva v. Global CJSC</i>	February 27, 2012	
PX-18	Decision of the Sixth Appellate Court in <i>Batryeva v. Global CJSC</i>	August 28, 2012	
PX-19	Declaration of Dmitriy Nikolaevich Markin	September 19, 2013	
PX-20	Declaration of Mikhail Semenovich Bologov	October 1, 2013	

As a result of the late deposition of Sorokina and Baltmark's September 18, 2013 production, Plaintiff's investigation is ongoing and Plaintiff respectfully reserves the right to this list.

Dated: October 9, 2013

/s/ Kevin R. Garden

Kevin R. Garden (VA Bar No. 30244)

kg@legal-counsels.com

International Legal Counsels PC

901 N. Pitt St., Suite 325

Alexandria, VA 22314

Telephone: (703) 535-5565

Fax: (202) 318-0723

Attorney for Plaintiff ZAO Odessky

Konjatschnyi Zawod

CERTIFICATE OF SERVICE

I hereby certify that on October 9, 2013, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Thomas Leo Appler Wilson Elser Moskowitz Edelman & Dicker LLP 8444 Westpark Dr., Suite 510 McLean, VA 22102 (703) 245-9300 Email: Thomas.Appler@wilsonelser.com	Andrew Clark Hall Wilson Elser Moskowitz Edelman & Dicker LLP 8444 Westpark Dr., Suite 510 McLean, VA 22102 703-245-9300 Fax: 703-245-9301 Email: andrew.hall@wilsonelser.com
Peter Meredith Moore Wilson Elser Moskowitz Edelman & Dicker LLP (McLean) 8444 Westpark Dr., Suite 510 McLean, VA 22102 703-245-9300 Fax: 703-245-9301 Email: peter.moore@wilsonelser.com	

Respectfully submitted,

/s/ Filipp Kofman

Filipp Kofman (VA Bar No. 82302)
fk@legal-counsels.com
Kevin R. Garden (VA Bar No. 30244)
kg@legal-counsels.com
International Legal Counsels PC
901 N. Pitt St., Suite 325
Alexandria, VA 22314
Telephone: (703) 535-5565
Fax: (202) 318-0723

*Attorneys for Plaintiff ZAO Odessky
Konjatschnyi Zawod*